

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MACNEIL AUTOMOTIVE PRODUCTS LIMITED, an Illinois Corporation,)	
)	
Plaintiff,)	No. 08 C 139
)	
v.)	
)	Hon. Joan B. Gottschall
CANNON AUTOMOTIVE LIMITED, f/k/a CANNON RUBBER LIMITED, AUTOMOTIVE DIVISION, a United Kingdom Company,)	
)	Magistrate Arlander Keys
)	
Defendant.)	<u>JURY TRIAL DEMANDED</u>

NOTICE OF MOTION

TO: See attached Certificate of Service

PLEASE TAKE NOTICE that on Thursday, January 24, 2007 at 9:30 a.m, or as soon thereafter as counsel may be heard, the undersigned shall appear before the Honorable Joan B. Gottschall, or whomever may be sitting in her stead, in Courtroom 2325, or wherever else counsel may be heard, of the Dirksen Federal Building, 219 S. Dearborn Street, Chicago, Illinois, and then and there present the attached MACNEIL'S MOTION TO ENJOIN DEFENDANT FROM PURSUING A COLLATERAL PROCEEDING IN A FOREIGN JURISDICTION.

Respectfully submitted,

**MACNEIL AUTOMOTIVE PRODUCTS
LIMITED**

Dated: January 8, 2008

By: /s/ Robert S. Grabemann
One of Its Attorneys

Robert S. Grabemann
Timothy M. Schaum
DASPIN & AUMENT, LLP

227 West Monroe Street
Suite 3500
Chicago, Illinois 60606
(312) 258-1600

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused a copy of the foregoing NOTICE OF MACNEIL'S MOTION TO ENJOIN DEFENDANT FROM PURSUING A COLLATERAL PROCEEDING IN A FOREIGN JURISDICTION, along with a copy of the Complaint, to be personally served by a Solicitor, in accordance with the English rules on service of process for these types of papers, on or about the 10th day of January, 2008 on:

Cannon Automotive Limited,
f/k/a Cannon Rubber Limited, Automotive Division
Brook House
881 High Road
Tottenham
London
N17 8EY
England

Richard Marshall
Manches LLP of
Aldwych House
81 Aldwych
London
WC2B 4RP
England

_____/s/ Robert S. Grabemann

Robert S. Grabemann